UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Phoenix Entertainment Partners, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:17-cv-1213
	)	
Kwench, LLC d/b/a Just John Nightclub, RJ International, Inc. d/b/a RJ Entertainment and Roman Ramos	)	The Hon. Ronnie L. White
	)	
Defendants.	)	

KWENCH, LLC'S MOTION TO DISMISS UNDER RULE 12(b)(6)

Kwench, LLC moves this Honorable Court to dismiss Phoenix Entertainment Partners, LLC's Complaint under Federal Rule of Civil Procedure 12(b)(6). Phoenix Entertainment Partners, LLC has failed to state a claim upon which relief can be granted. As such, the Complaint should be dismissed, *with prejudice*.

Respectfully submitted,
KWENCH, LLC, d/b/a JUST JOHN, by

/s/ Jonathan LA Phillips
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Certificate of Service

Undersigned certifies and states that on May 3, 2017, he caused the foregoing document to be filed with the Court's CMECF system, thereby serving all counsel of record by electronic mail. On that same day he also placed a copy of the same in the US Mail, postage prepaid, to the last known address of any parties not receiving electronic mail service.

/s/ Jonathan LA Phillips